RCRA REVISION CHECKLIST 28

Standards for Hazardous Waste Storage and Treatment Tank Systems
51 FR 25422-25486
July 14, 1986
as amended on August 15, 1986 at 51 FR 29430-29431
(Non-HSWA Cluster III and HSWA Cluster I)

Note: 1) This checklist is part of both non-HSWA Cluster III and HSWA Cluster I. States are encouraged to apply for this checklist under non-HSWA Cluster III as its due date occurs sooner than that for the HSWA Cluster. Those changes which implement HSWA are marked as Footnote 1. Please read this footnote for further guidance regarding these provisions. 2) Additional interpretation, clarification, and correction of typographical errors relative to this Revision Checklist 28 are subsequently addressed by Revision Checklist 52 (September 2, 1988, 53 <u>FR</u> 34079). States are encouraged to consider the changes associated with Revision Checklist 52 when implementing the changes addressed by Revision Checklist 28.

				ANALOGOUS	EQUIV-	MORE	BROADER
	FEDERAL REQUIREMENT	FEDERAL RCRA CITATION		STATE CITATION	ALENT	STRINGENT	IN SCOPE
	PART 260) - HAZARDOUS WASTE	E M	IANAGEMENT SY	STEM: GEN	IERAL	
		SUBPART	В-	DEFINITIONS			
	DEFINITIONS						
1	"aboveground tank"	260.10					
1	"ancillary equipment"	260.10					
1	"component"	260.10					
1 1	"corrosion expert" "existing tank system" or "existing	260.10					
	component"	260.10					
1	"inground tank" "installation	260.10					
	inspector"	260.10					
1	"leak detection system"	260.10					
1	"new tank system"	260.10					
1	"on ground tank"	260.10					
1	"sump"	260.10					
1	"tank system"	260.10					

	and freatment ran	ik Oysteriis (cont d)	STATE	ANALOG
		ANALOGOUS	EQUIV- MORE	BROADE
FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	STATE CITATION	ALENT STRINGENT	IN SCO
"underground tank"	260.10			
"unfit-for-use tank	200.10			
system"	260.10			
"zone of engineering	200110			
control"	260.10			
PART 26	1 - IDENTIFICATION AND	LISTING OF HAZAI	RDOUS WASTE	
	SUBPART A	- GENERAL		
EXCLUSIONS				
secondary materials				
reclaimed or returned				
to process	261.4(a)(8)			
PART 262 - STA	NDARDS APPLICABLE TO	GENERATORS O	HAZARDOUS WAST	Έ
	SUBPART C - PRE-TRAN	SPORT REQUIREN	MENTS	
ACCUMULATION TIME				
accumulation				
on-site	262.34(a)(1)			
compliance with	202 24(4)(2)			
Subpart I of 265 compliance with	262.34(d)(2)			
Subpart J of 265	262.34(d)(3)			
<u> </u>	202.0+(u)(0)			
PART 264 - STAN	NDARDS FOR OWNERS A	ND OPERATORS C	F HAZARDOUS WAS	TE
-	reatment, storage a	ND DISPOSAL FAC	CILITIES	
	SUBPART B - GENERAL	FACILITY STANDA	ARDS	
	OUDI AITI D'OLINLITAL	TAOILITT STANDA	11.00	
GENERAL INSPECTION	REQUIREMENTS			
frequency of				
inspection	264.15(b)(4)			
SUBPART	E - MANIFEST SYSTEM, R	ECORDKEEPING,	AND REPORTING	
OPERATING RECORD				
C. LIVITING ILLOUID				

	and freatment fank dystems (contd)	ΓΕ ANALOG I
	ANALOGOUS EQUIV- MORE	BROADE
FEDERAL REQUIREMENT	FEDERAL RCRA CITATION STATE CITATION ALENT STRINGENT	IN SCOPE
data requirements	264.73(b)(6)	
	SUBPART G - CLOSURE AND POST-CLOSURE	
APPLICABILITY		
closure and post-		
closure compliance		
with 264.197	264.110(b)(3)	
	SUBPART H - FINANCIAL REQUIREMENTS	
APPLICABILITY		
financial		
responsibility		
compliance		
with 264.197	264.140(b)(3)	
	SUBPART J - TANK SYSTEMS	
APPLICABILITY		
applicability, tank		
systems used for		
storing or treating		
hazardous waste	264.190	
exemptions from	20 11.00	
secondary contain-		
ment requirements	264.190(a)&(b)	
	TING TANK SYSTEM'S INTEGRITY	
written assessment	004.404/-\	
requirement	264.191(a)	
minimum assessment considerations	264 101/b)	
12 mos. deadline if	264.191(b)	
materials become		
hazardous waste		
after 7/14/86	264.191(c)	
tank systems found to		
be leaking or unfit for		
use	264.191(d)	
	•	·
	TION OF NEW TANK SYSTEMS OR COMPONENTS	
information to be		

	and mediment ran			ANALOG IS:
FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	MORE <u>[RINGENT </u>	BROADER IN SCOPE
included in written				
assessments for new				
<u>tanks</u>	264.192(a)			
new tank installation				
procedures; inspection				
requirements	264.192(b)			
backfilling require-				
ments for new under-	264 102(a)			
ground tank systems	264.192 <u>(c)</u>			
tightness requirement	264.192(d)			
protection of	(a)			
ancillary equipment	264.192(e)			
corrosion protection	` ,			
requirements	264.192(f)			
written statements and				
certification				
statements	264.192(g)			
CONTAINMENT AND DE	TECTION OF RELEASES			
schedule for providing	TECTION OF RELEASES			
secondary containment				
for tank systems	264.193(a)			
minimum requirements	• •			
for secondary				
systems	264.193(b)			
minimum spec.				
of secondary	004.400(.)			
containment	264.193(c)			
devices that satisfy the secondary contain-				
ment requirements	264.193(d)			
additional requirements	204.193(d)			
for liner and vault				
systems, and double-				
walled tanks	264.193(e)			
ancillary equipment	,			
must be provided with				
full secondary				
containment	264.193(f)			
exceptions at	004.400(0(4): (4)			
264.193(f)	264.193(f)(1)-(4)			
variance requirements	264.193(g)			
requirements for	20 1 . 130(y)			
addressing releases				
and a control of the				

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			ANALOGOUS	EQUIV-	MORE	BROADER
	FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	STATE CITATION	ALENT	STRINGENT	IN SCOPE
	from tank systems that					
	have obtained					
	variances	264.193(g)(3)&(4)				
1	procedures for					
†	requesting a variance	264.193(h)				
1,2	requirements for all					
	tank systems until					
	such time as second-					
	ary containment is					
	provided	264.193(i)				
	•	•				
	GENERAL OPERATING F	REQUIREMENTS				
1	hazardous waste or					
	treatment reagents not					
	to be placed in tank					
	systems	264.194(a)				
1	minimum controls and	` ,				
	practices to prevent					
	spills and overflows	264.194(b)				
1	requirements if a leak	• •				
	or spill occurs in the					
	tank system	264.194(c)				
	INSPECTIONS					
1	schedules & procedure					
	for inspecting overfill					
	controls	264.195(a)				
1	daily inspection					
	requirements	264.195(b)				
1	minimum inspection					
	frequency for cathodic					
	protection systems	264.195(c)				
1	documentation in					
	operating record	264.195(d)				
		R SPILLS AND DISPOSIT	ION OF LEAKING OF	R UNFIT-F	FOR-USE	
	TANK SYSTEMS					
1	immediate removal					
	(from service) of					
	leaking or unfit-for-use					
	tank systems	264.196				
1	prevent flows of					
	additional wastes	264.196(a)				

		and Treatment Tan	k Systems (cont'd)		QTATE	ANALOG IS:
			ANALOGOUS	EQUIV-	MORE	BROADER
	FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	STATE CITATION	ALENT	STRINGENT	IN SCOPE
1	removal of waste from					
	tank system or					
	secondary contain	201 400(h)				
1	ment system containment of visible	264.196(b)				
1	releases to the					
	environment	264.196(c)				
		,				
1,2	notifications/reports	264.196(d)				
1	provision of second-					
	ary containment,	264.406(a)				
1,2	repair, or closure certification closure	264.196 <u>(e)</u>				
1,2	requirements	264.196(f)				
	CLOSURE AND POST-C	LOSURE CARE				
1	general closure	004.407(-)				
1	requirements specific requirements	264.197(a)				
ı	when contaminated					
	soils cannot					
	practicably be					
	removed or decontam-					
	inated; closure as a					
4.0	landfill	264.197(b)				
1,2	closure plans and financial responsibility					
	requirements for tank					
	systems without					
	secondary containment					
	that fall under					
	§264.193(b)-(f) and					
	are not exempt from					
	secondary contain- ments requirements	264.197(c)				
	onto roquironionto					
	`	<u>TS FOR IGNITABLE OR RE</u>	EACTIVE WASTES			
1	limited placement of I					
	or R wastes in tank	004.400(-)				
1	systems compliance with	264.198(a)				
1	maintenance of					
	protective distances	264.198(b)				
	•					
	SPECIAL REQUIREMENT	TS FOR INCOMPATIBLE W	VASTES			

	and meannem rai	ik Oysterns (conta)	STATE ANALO	OG 18.
		ANALOGOUS	EQUIV- MORE BROA	
FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	STATE CITATION	ALENT STRINGENT IN SC	OPE
limited placement of				
incompatible wastes in				
tank systems	264.199(a)			
use of tank system				
that previously held				
incompatible wastes	264.199(b)			
remove paragraph	264.200			
	FERIM STATUS STANDAR US WASTE TREATMENT, S			
	SUBPART B - GENERAL	FACILITY STANDA	RDS	
GENERAL WASTE ANA	LYSIS			
methods for additional				
waste analysis	265.13(b)(6)			
GENERAL INSPECTION	REQUIREMENTS			
inspection frequency	265.15(b)(4)			
SUBPART	E - MANIFEST SYSTEM, F	RECORDKEEPING, A	AND REPORTING	
OPERATING RECORD				
records & results of				
analysis & trial tests	265.73(b)(3)			
monitoring, testing, of	(1) (2)			
analytical data	265.73(b)(6)			
	SUBPART G - CLOSUR	E AND POST-CLOS	JRE	
APPLICABILITY				
tank systems which				
must comply with land-				
fill requirements	265.110(b)(2)			
	SUBPART H - FINANC	CIAL REQUIREMENT	rs .	
financial responsi-				
bility requirements	265.140(b)			
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FEDERAL REQUIREME	NT I FI	EDERAL RCRA	CITATION	ANALOGOUS STATE CITATION		QUIV- ENT I	MORE STRINGENT	BROADER
·				TANK SYSTEMS	•		<u> </u>	
APPLICABILITY								
tank systems used	for							
storing & treating	101							
hazardous waste	2	65.190						
exemptions from								
secondary containm	nent							
requirements		65.190(a)&	(b)					
ASSESSMENT OF	EXISTIN	G TANK SY	STEMS OF	R COMPONENT	S			
written assessment								
<u>requirement</u>		<u>65.191(a) </u>						
minimum assessme								
<u>considerations</u>		<u>65.191(b) </u>						
12 mos. deadline fo	or							
materials which								
became hazardous								
waste after 7/14/86		65.191(c)						
tank systems found	to	65.191(c)						
tank systems found be leaking or unfit for	to or	,						
tank systems found	to or	65.191(c) 65.191(d)						
tank systems found be leaking or unfit fouse	to or 2	65.191(d)	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST	to or 2	65.191(d)	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be	to or <u>2</u> ALLATIO	65.191(d)	' TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the written	to or <u>2</u> ALLATIO	65.191(d)	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit for use DESIGN AND INST information to be included in the written assessment for new	to or <u>2</u> ALLATIO en v	65.191(d) N OF NEW	' TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the written assessment for new underground tank	to or <u>2</u> ALLATIO en v 2	65.191(d)	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the writt assessment for new underground tank new tank installation	to or <u>2</u> ALLATIO en v <u>2</u>	65.191(d) N OF NEW	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the writt assessment for new underground tank new tank installation procedures; inspect	to or2 CALLATIO en2 n tion	65.191(d) N OF NEW 65.192(a)	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the written assessment for new underground tank new tank installation procedures; inspect requirements	to or2 CALLATIO en2 n tion	65.191(d) N OF NEW	' TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the writtent assessment for new underground tank new tank installation procedures; inspect requirements backfilling require-	to or 2 TALLATIO en v 2 n tion 2	65.191(d) N OF NEW 65.192(a)	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the written assessment for new underground tank new tank installation procedures; inspect requirements	to or 2 ALLATIO en v 2 n tion 2	65.191(d) N OF NEW 65.192(a)	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the written assessment for new underground tank new tank installation procedures; inspect requirements backfilling requirements for new underground tank new tank installation procedures; inspect requirements	to or 2 TALLATIO en v 2 n tion 2 er- s 2	65.191(d) N OF NEW 65.192(a)	TANK SYS	STEMS OR COM	IPONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the writtent assessment for new underground tank new tank installation procedures; inspect requirements backfilling requirements for new underground tank system tightness requirements for of	to or2 TALLATIO T	65.191(d) N OF NEW 65.192(a) 65.192(b)	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the writt assessment for new underground tank new tank installation procedures; inspect requirements backfilling requirements for new underground tank system tightness requirements protection of ancillary equipment	to or2 ALLATIO en2 ntion2 ers2 ents2	65.191(d) N OF NEW 65.192(a) 65.192(b)	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the writtent assessment for new underground tank new tank installation procedures; inspect requirements backfilling requirements for new underground tank system tightness requirements protection of	to or2 ALLATIO en2 ntion2 ers2 ents2	65.191(d) N OF NEW 65.192(a) 65.192(b) 65.192(c)	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the writt assessment for new underground tank new tank installation procedures; inspect requirements backfilling requirements for new underground tank system tightness requirement protection of ancillary equipment corrosion protection requirements	to or2	65.191(d) N OF NEW 65.192(a) 65.192(b) 65.192(c)	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the writt assessment for new underground tank new tank installation procedures; inspect requirements backfilling requirements for new underground tank system tightness requirement protection of ancillary equipment corrosion protection requirements written statements and the second statements of the second statement of th	to or2	65.191(d) N OF NEW 65.192(a) 65.192(b) 65.192(c) 65.192(d)	TANK SYS	STEMS OR COM	1PONENT	S		
tank systems found be leaking or unfit fouse DESIGN AND INST information to be included in the writt assessment for new underground tank new tank installation procedures; inspect requirements backfilling requirements for new underground tank system tightness requirement protection of ancillary equipment corrosion protection requirements	to or2 TALLATIO T	65.191(d) N OF NEW 65.192(a) 65.192(b) 65.192(c) 65.192(d)	TANK SYS	STEMS OR COM	1PONENT	S		

		, ,	STATE ANALOG IS
FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	ANALOGOUS STATE CITATION	EQUIV- MORE BROADER ALENT STRINGENT IN SCOPE
P 1299 6	•		
applicability of			
secondary containment	(()		
<u>requirements</u>	265.193(a)		
minimum requirements			
for secondary contain-			
ment systems	265.193(b)		
minimum specifications			
of secondary			
containment	265.193(c)		
devices that secondary			
containment for tanks			
must include	265.193(d)		
additional requirements	200.100(d)		
for liner and vault			
systems, and doubled			
walled tanks	265 102(a)		
	265.193(e)		
ancillary equipment			
must be provided with			
full secondary	227 (22(5)		
containment	265.193(f)		
exception to 265.193(f)	265.193(f)(1)-(4)		
variance requirements	265.193(g)		
procedures for request-			
ing a variance	265.193(h)		
requirements for all			
tanks systems until			
such time as			
secondary containment			
is provided	265.193(i)		
- 			
GENERAL OPERATING	REQUIREMENTS		
hazardous waste or			
treatment reagents not			
to be placed in tank			
system	265.194(a)		
minimum controls and			
practices to prevent			
spills and overflows	265.194(b)		
requirements if a leak			
or spill occurs in the			
tank system	265.194(c)		
tariit Systom	200.107(0)		
INSPECTIONS			

			- , ,		STATE	ANALOG IS:
			ANALOGOUS	EQUIV-	MORE	BROADER
	FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	STATE CITATION	ALENT	STRINGENT	IN SCOPE
	1.9.1					
1	daily inspection	005.405(.)				
	requirements	265.195(a)				
1	minimum inspection					
	frequency for cathodic					
	protection system	265.195(b)				
1	documentation in					
	operating record	265.195(c)				
	DECDONICE TO LEAVE		ITION OF LEAKING OF			
	RESPONSE TO LEAKS (OR SPILLS AND DISPOS	THON OF LEAKING OF	K UNFII-	-OR-USE	
	TANK SYSTEMS					
1	immediate removal					
	(from service) of					
	leaking or unfit-for-use	005.400				
	tank systems	265.196				
1	prevent flow of					
	additional wastes	265.196(a)				_
1	removal of waste from					
	tank system or					
	secondary containment					
	system	265.196(b)				
1	containment of visible					
	releases to the					
	environment	265.196(c)				
		005.400/ 1)				
1	notifications/reports	265.196(d)				
1	provision of secondary					
	containment, repair, or	005 400()				
	closure	265.196(e)				
1	certification of	005 400(0				
	major repairs	265.196(f)				
	OLOGUDE AND DOCT O	LOCUPE CARE				
	CLOSURE AND POST-C	LUSURE CARE				
1	general closure	005.407()				
	requirements	265.197 <u>(a)</u>				
1	specific requirements					
	when contaminated					
	soils cannot					
	practicably be					
	removed or decontam-					
	inated; closure as a					
	landfill	265.197(b)				

		ANALOGOUS	EQUIV-	MORE	BROA
FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	STATE CITATION	ALENT		IN SCC
requirements for tank					
systems without					
secondary containment					
that fall under					
§265.193(b)-(f) and					
are not exempt from					
secondary containment					
requirements	265.197(c)				
SPECIAL REQUIREMEN	TS FOR IGNITABLE OR R	EACTIVE WASTES			
limited placement of I					
or R wastes in tank					
systems	265.198(a)				
compliance with	. ,				
maintenance of					
protective distance	265.198(b)				
	, ,	****			
	TS FOR INCOMPATIBLE \	NASTES			
limited placement of					
incompatible wastes in	005 400(-)				
tank systems	265.199(a)				
use of tank system					
that previously held	005 400/h)				
incompatible wastes	265.199(b)				
WASTE ANALYSIS AND	TRIAL TESTS				
waste analysis and					
treatment or storage					
tests	265.200(a)				
obtain written, docu-					
mented information on					
similar waste/					
operating conditions	265.200(b)				
SDECIAL DECLUDEMENT	TS FOR GENERATORS O	SE DETMEEN 400 A	NID 1000 I/		-
ACCUMULATE HAZARD		A DEIMEEN IOU A	א טטטו שאו	G/IVIO I TA I	
	OUS WASTE IN TAINNS				
general applicability	265 201(a)				
requirements	265.201(a)				
general operating					
requirements for					
generators of between					
100 and 1000 kg/mo	005 004 (b)				
of hazardous waste	265.201(b)				
inspection	265 201(a)				
<u>requirements</u>	265.201(c)				

	and Treatment Tan	k Systems (contra)	
		ANALOGOUS	STATE ANALOG IS EQUIV- MORE BROADER
FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	STATE CITATION	ALENT STRINGENT IN SCOPE
closure requirements	265.201(d)		
special requirements	•		
for I or R wastes	265.201(e)		
special requirements	•		
for incompatible			
wastes	265.201(f)		
PAR	T 270 - EPA ADMINISTERE HAZARDOUS WASTE		
	SUBPART B - PERI	MIT APPLICATION	
CONTENTS OF PART B	GENERAL REQUIREMEN	ITS	
general inspection			
schedule	270.14(b)(5)		
copies of closure and	, , , ,		
post-closure plans	270.14(b)(13)		
	RMATION REQUIREMENTS	S FOR TANK SYS	IEMS
written certified			
assessment of each			
tank system	270.16(a)		
dimensions and			
capacity of each tank	270.16(b)		
description of feed			
systems, safety cutoff			
bypass systems, and			
pressure controls	270.16(c)		
diagram of piping,			
instrumentation, and			
process flow for each			
tank system	270.16(d)		
description of external			
corrosion protection	270.16(e)		
description of new			
tank installation	270.16(f)		
plans and description			
of secondary contain-			
ment systems	270.16(g)		
information require-			
ments for systems for			
which a variance will			
be sought	270.16(h)		

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	and meannem ran	ik Systems (cont a)		TATE ANIAL 00 10
-		ANALOGOUS	EQUIV- MORE	BROADER
FEDERAL REQUIREMENT	FEDERAL RCRA CITATION	STATE CITATION	ALENT STRING	_
FEDERAL REQUIREMENT	PEDERAL RORA CITATION	STATE CITATION	IALENT STRING	LINI IN SCOPE
description of controls				
and practices to				
prevent spills and				
overflows	270.16(i)			
description of design	27 0.10(1)			
and operating for tank				
systems handling				
ignitible, reactive,				
or incompatible wastes	270.16(j)			
	SUBPART G - IN	ITERIM STATUS		
CHANGES DURING INT	ERIM STATUS			
changes made solely				
to comply with				
§265.193 not included				
under this section	270.72(e)			
1	These regulations implen	nent HSWA only to	the extent that they	apply to tank
	systems owned or operated by small quantity generators, establish leak			
	detection requirements for all new underground tank systems, and establish			
	permitting standards for underground tank systems that cannot be entered			
	for inspection. They also implement RCRA insofar as they apply to certain			
	other tank systems. It is recommended that States seek program			
	modification for the rules promulgated under both RCRA authority and HSWA			
	authority by the deadline	for the non-HSWA	Cluster III (July 1, 1	1988).
2	See technical corrections	of August 15, 100	6 (51 ED 20420)	
	See rechnical contections	. OI AUGUSE 13. 196	U 13 L EK 2943U).	

See technical corrections of August 15, 1986 (51 FR 29430).